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7 Attorneys for Plaintiffs

UNITED STATES COURT

NORTHERN DISTRICT OF CALIFORNIA

8 SAUSALITO/MARIN COUNTY CHAPTER)
9 OF THE CALIFORNIA HOMELESS UNION)
10 on behalf of itself and those it represents;)
11 ROBBI POWELSON; SHERI I.McGREGOR;)
12 MICHAEL ARNOLD; ARTHUR BRUCE;)
13 MELANIE MUASOU; SUNNY JEAN YOW;)
14 NAOMI MONTEMAYOR; MIKE NORTH)
15 and JACKIE CUTLER on behalf of)
16 themselves and similarly situated homeless)
17 persons,)

18 Plaintiffs

19 vs.

20 CITY OF SAUSALITO; MAYOR JILL)
21 JAMES HOFFMAN; POLICE CHIEF JOHN)
22 ROHRBACHER; CITY MANAGER)
23 MARCIA RAINES; DEPT. OF PUBLIC)
24 WORKS SUPERVISOR KENT BASSO,)
25 individually and in their respective official)
26 capacities,)

27 Defendants.

Case No.: 3:21-CV-01143-EMC

**PLAINTIFF'S DISCLOSURE OF
EXPERT WITNESS AND SUMMARY OF
ANTICIPATED TESTIMONY**

Honorable Edward M. Chen

Hearing Date: May 14, 2021

Time: 1:30 pm

**PLAINTIFF'S DISCLOSURE OF PLAINTIFF'S EXPERT WITNESS AND
ANTICIPATED TESTIMONY**

26 Plaintiff's Expert Witness in the above-captioned case is Robyn Ray, National Special
27 Projects Manager for EMSL Analytical, Inc. a national toxic materials testing and analysis firm
28 headquartered in New Jersey. She has been employed by EMSL for approximately 20 years.

1 Projects Manager Ray will essentially augment her previously filed letter in which she
2 addressed deficiencies in the air sampling and lab analysis performed by Monte Diegnan, Inc.

3 She will testify that the collection process used by Diegnan, Inc. was defective, did not
4 follow standard procedures per the Environmental Protection Agency (EPA) and best practices in
5 the industry; that the conditions prevailing at Marinship Park on the testing date of March 11, 2021
6 were such that no accurate measurement for hazardous airborne particulates could have or was
7 obtained. She will also discuss proper procedures for set up and handling of air sampling
8 equipment, errors made by Defendants' consultant in the analysis of the samples collected and what
9 should have been done to obtain a truly representative sample of dust generated by the fiberglass
10 boat crushing and its migration to the section of Marinship Park proposed by Defendants for a
11 homeless encampment.
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14 Dated: May 6, 2021

Respectfully Submitted,

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16 /s/ Anthony D. Prince,
Attorney for Plaintiff
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